

1 ADAM PAUL LAXALT  
Attorney General  
2 CAMERON P. VANDENBERG  
Chief Deputy Attorney General  
3 Nevada Bar No. 4356  
4 DOMINIKA J. BATTEN  
Deputy Attorney General  
5 Nevada Bar No. 12258  
6 State of Nevada  
Office of the Attorney General  
7 5420 Kietzke Lane, Suite 202  
8 Reno, NV 89511  
(775) 687-2103 (phone)  
9 (775) 688-1822 (fax)  
Email: [cvandenberg@ag.nv.gov](mailto:cvandenberg@ag.nv.gov)  
10 [dbatten@ag.nv.gov](mailto:dbatten@ag.nv.gov)  
11 *Attorneys for Defendants*  
12 *Nevada Department of Transportation,*  
*Wilson Marshall, and Sonnie Braih*

13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 KENDRICK CRAWFORD,

16 Plaintiff,

17 vs.

18 NEVADA DEPARTMENT OF  
19 TRANSPORTATION, a Department of the  
20 State of Nevada; WILSON MASHALL, an  
individual employed by the State of Nevada;  
21 and SONNIE BRAIH, an individual  
employed by the State of Nevada,

22 Defendants.

Case No. 2:17-cv-00655-GMN-PAL

**STIPULATION AND ORDER  
REQUESTING TIME FOR  
DEFENDANTS TO REPLY TO  
PLAINTIFF'S RESPONSE TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

**(First Request)**

23 Plaintiff, KENDRICK CRAWFORD (hereinafter "Plaintiff"), by and through his  
24 counsel Trevor J. Hatfield, of Hatfield & Associates, Ltd., and Defendants NEVADA  
25 DEPARTMENT OF TRANSPORTATION, a Department of the State of Nevada, WILSON  
26 MARSHALL and SONNIE BRAIH, individuals employed by the NEVADA DEPARTMENT  
27 OF TRANSPORTATION (NDOT), by and through legal counsel, Adam Paul Laxalt, Attorney  
28 General, Cameron P. Vandenberg, Chief Deputy Attorney General, and Dominika J. Batten,

1 Deputy Attorney General, and do hereby stipulate and agree to an extension of time for  
2 Defendants to reply to Plaintiff's Response to Defendants' Motion for Summary Judgment  
3 (ECF #35) that was filed on May 11, 2018. Defendants' reply is currently due on May 25, 2018.

4 This request is submitted pursuant to LR IA 6-1, 6-2, and LR 7-1 and is the parties' first  
5 request for an extension of time for Defendants to file their reply to Plaintiff's Response to  
6 Defendants' Motion for Summary Judgment (ECF #35). The parties make this request because  
7 Defendants' counsel was out of the office for three weeks of emergency family leave, returning  
8 to work last week. Additionally, to facilitate settlement negotiations, the parties seek to further  
9 extend the time for Defendants to file their reply to fourteen days after the parties attend the  
10 settlement conference scheduled by the Court (ECF #36) for July 11, 2018, before Magistrate  
11 Judge Peggy A. Leen. Accordingly, NDOT shall have up to and including July 25, 2018, to  
12 reply to Plaintiff's Response to Defendants' Motion for Summary Judgment (ECF #35).

13 Dated: May 23, 2018

Dated: May 23, 2018

14 ADAM PAUL LAXALT  
15 Attorney General

HATFIELD & ASSOCIATES, LTD.

16 By: /s/ Dominika J. Batten  
17 CAMERON P. VANDENBERG  
18 Chief Deputy Attorney General  
19 Nevada State Bar No. 4356  
20 DOMINIKA J. BATTEN  
21 Deputy Attorney General  
22 Nevada State Bar No. 12258  
23 Office of the Attorney General  
24 5420 Kietzke Lane, Suite 202  
25 Reno, NV 89511  
26 *Attorneys for Defendants*

By: /s/ Trevor J. Hatfield  
TREVOR J. HATFIELD, ESQ.  
Nevada State Bar No. 7373  
703 S. Eighth St.  
Las Vegas, NV 89101  
(702) 388-4469 Tel  
(702) 386-9825 Fax  
[thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
*Attorney for Plaintiff*

## ORDER

24 **IT IS SO ORDERED.**

25 Dated this 23 day of May, 2018.

  
Gloria M. Navarro, Chief Judge  
UNITED STATES DISTRICT COURT